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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI

DR. AMY R. WOODS,)
)
Plaintiff,) CAUSE NO. 3:19CV234
)
VS.)
)
MHM HEALTH PROFESSIONALS, LLC.)
D/B/A CENTURION PROFESSIONALS;))
MANAGEMENT & TRAINING)
CORPORATION;)
JESSE WILLIAMS, INDIVIDUALLY;)
AND JOHN DOES 1-9,)
)
Defendants.)

EXCERPT OF THE TRIAL TESTIMONY OF TRACI COX
BEFORE UNITED STATES SENIOR DISTRICT JUDGE NEAL B. BIGGERS
MONDAY, MARCH 21, 2022
OXFORD, MISSISSIPPI

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1 (BEGINNING OF THE TRIAL TESTIMONY OF TRACI COX)

2 THE COURT: All right. Is the plaintiff ready to
3 proceed?

4 MR. WAIDE: Yes, sir.

5 THE COURT: Who do you call?

6 MR. WAIDE: Traci Cox.

7 MRS. WAIDE: Your Honor, may I retrieve Ms. Cox?

8 And, also, may we invoke the rule, Your Honor?

9 THE COURT: Yes.

10 MR. LONG-DANIELS: We agree to that, Your Honor.

11 THE COURT: Okay. I see no one in the courtroom who
12 is planning on being a witness; so, if anybody sees somebody
13 come in who's a witness, you can let me know.

14 MR. WAIDE: (Nodding head).

15 THE COURT: Now, these witnesses who testify, ladies
16 and gentlemen of the jury, will have that shield over their
17 face. The reason for that being is that you as jurors are the
18 judges of the truthfulness, the credibility of these witnesses.
19 And we figured for you to be able to do that well you need to
20 see their faces as they testify.

21 And the mask covers up. You don't know if they're
22 laughing or smirking or what. So, with these shields, you can
23 get an idea of how they're looking when they testify.

24 (OATH ADMINISTERED BY THE COURTROOM DEPUTY)

25 THE COURTROOM DEPUTY: And, if you would, please

1 state and spell your first and last name for the record.

2 THE WITNESS: Traci Cox.

3 THE COURTROOM DEPUTY: Will you spell that for us,
4 please?

5 THE WITNESS: T-r-a-c-i. C-o-x.

6 THE COURT: All right, sir.

7 TRACI COX, PLAINTIFF'S WITNESS, SWORN

8 DIRECT EXAMINATION

9 BY MR. WAIDE:

10 Q. Ma'am, you're Traci Cox?

11 A. Yes, sir.

12 Q. What is your profession?

13 A. I'm a nurse practitioner.

14 Q. Where do you live?

15 A. I live in Pontotoc.

16 Q. Where do you work today?

17 A. I work at Marshall County Correctional Facility in Holly
18 Springs.

19 Q. Who runs the Marshall County Correctional Facility today?

20 A. Well, on the security side, the State runs it. But, on
21 the medical side, it's VitalCore Health Strategies.

22 Q. All right. So the company Centurion no longer provides
23 health services there; is that correct?

24 A. No, sir.

25 Q. And the company known as MTC no longer runs the prison

1 there?

2 A. They do not.

3 Q. It's run by the State?

4 A. Yes, sir.

5 Q. Let me take you back to when you were first hired there.

6 When were you first hired at Marshall County?

7 A. In around June of 2016.

8 Q. And who was the health-care provider that hired you at

9 that time?

10 A. It would have been Centurion.

11 Q. When you were hired in '16, was there a doctor hired

12 there? Was there a doctor working on the health care?

13 A. Yes, sir. There was a doctor there. And I forgot there

14 was also a nurse practitioner there that was quitting.

15 Q. So you had two nurse practitioners and a doctor?

16 A. Well, they hired me to replace her because she was

17 quitting.

18 Q. So how long did that doctor stay there?

19 A. He interviewed me around the middle of May. And, at that

20 point, he said, "Who is going to be your collaborator? Because

21 they know that I'm leaving." And that prevented me from

22 starting right away. But, when I started, the nurse

23 practitioner there was leaving in a couple of weeks; and the

24 doctor had already gone.

25 Q. So was there, or was there not, a doctor, then, when you

1 began working?

2 A. No. There was a nurse practitioner there but not a
3 doctor.

4 Q. So was it -- do I understand the nurse -- was it you and
5 another nurse practitioner, or were you the only nurse
6 practitioner there?

7 A. Well, she -- I was there with her for a couple of weeks
8 because she was quitting. And she kind of trained me what to
9 do when I would be taking that position over when I had a
10 doctor.

11 Q. So did you then become the nurse practitioner for the
12 facility at that time?

13 A. Well, I couldn't because I didn't have a doctor. So I
14 actually just worked as an RN until Dr. Woods came and signed
15 on with me around 4 months -- 4 or 5 months later.

16 Q. So, for the first 4 or 5 months while you worked there, do
17 I understand that there was neither a doctor or nor a nurse
18 practitioner who could work as a nurse practitioner there?

19 A. No, sir. There was not.

20 Q. There was not. So how did y'all -- how did you handle,
21 say, hepatitis C patients? How would you treat hepatitis C?

22 A. Well, that would be considered a chronic care patient;
23 and, if any of those people were seen, they would have been
24 seen by Dr. Brazier from telehealth. We did telehealth maybe
25 one day a week, or tried to. And he would have seen them --

1 Q. One day a week?

2 A. Yes, sir.

3 Q. In your opinion, was it creating a problem so far as
4 medical care not to have a doctor there at that facility,
5 working at the facility?

6 A. Oh, yes. Abs -- yes.

7 MR. LONG-DANIELS: Your Honor, may I object?
8 Relevancy. This is before Dr. Woods even got there.

9 THE COURT: Overruled.

10 BY MR. WAIDE:

11 Q. What was the nature? Why would it create a problem for
12 them not to have a doctor there?

13 A. Well, there's nobody to see patients that needed to be
14 seen. There was nobody there to see those thousand inmates
15 that have medical problems.

16 Q. How bad a backlog did you have with patients needing to
17 see a doctor when Dr. Woods first came?

18 A. I think we were backlogged maybe -- I want to say
19 200-and-something, 300, may -- it was a lot.

20 Q. Would you -- about when did Dr. Woods start to work there,
21 approximately when was that?

22 A. Well, she didn't start to work until about January. But
23 she signed on with me as my collaborating physician in
24 November. So I got to start seeing patients -- actually seeing
25 patients in November because I had her as my collaborating

1 doctor.

2 Q. And when did she actually start working as a doctor there?

3 A. It was in January, probably first, second week of January.

4 Q. Of what year?

5 A. That would have been 2017.

6 Q. Did you have occasion to work with her or work under her
7 then?

8 A. Oh, yes.

9 Q. Did you have occasion to observe her treating the
10 patients?

11 A. Every day.

12 Q. Would you describe for the jury what kind of doctor she
13 was? How would you describe her?

14 A. She was a phenomenal doctor. She was kind and caring and
15 cared about the inmates, and she cared about all of us. But
16 she -- and she expected us to work. She let you know when you
17 were doing something wrong. And she was quick to let you know
18 when you were doing stuff right too, which is always
19 appreciated. She treated them with respect and kindness, and
20 they still ask about her.

21 Q. So did you ever get -- do you know Warden Williams, or
22 former Warden Williams, the warden that was there at that time?

23 A. Yes, sir, I do.

24 Q. Did you ever get to observe his attitude toward the
25 inmates there?

1 A. I mean, not that I -- I mean, not really. Not -- I mean,
2 I was so busy with other things. If he was dealing with an
3 inmate, I really didn't --

4 Q. Okay. Did you ever hear him make any comments about what
5 his attitude was toward inmates?

6 A. I mean, an inmate told me once that you never knew how to
7 take him; that sometimes he would be really nice, and then the
8 next time he would jump on them as an inmate, you know. But, I
9 mean, I didn't see that.

10 Q. Oh, you didn't see that; you didn't observe that?

11 A. No, sir.

12 Q. Before Dr. Woods left, in the several months before
13 Dr. Woods left, can you tell the jury about whether or not you
14 had a shortage in staff, security staff, there at the prison
15 and especially as it related to y'all's medical area?

16 A. Well, yes, sir. We had trouble getting patients to
17 medical. And, usually, the reason was -- that we got was,
18 well, there's only one officer in A Dorm; or there's nobody in
19 the dorm; or that person's tied up doing something else because
20 they're the only person in that dorm.

21 Q. So do you know whether or not Dr. Woods ever complained to
22 anybody about the lack of security staff to get patients to
23 medical?

24 A. Yes, sir. She -- she complained to, of course, our
25 administrator, who has to go and try to get that situation

1 resolved. And she told our -- she told Centurion, the people
2 at Centurion.

3 Q. All right. When you say your "administrator," you mean
4 the administrator that works for Centurion; or do you mean the
5 warden who works for the prison?

6 A. Our administrator that works for Centurion, the medical
7 administrator. And I know she went to the warden; I just
8 wasn't there for those meetings.

9 Q. I see. All right. Who was the administrator that worked
10 at Centurion before Travis Day came; who was that?

11 A. His name was Hunter Williamson.

12 Q. And he was employed by who?

13 A. Centurion.

14 Q. And, when Mr. Williamson was there and when complaints
15 would be made to him about not getting patients down to medical
16 care, what was his attitude about it?

17 A. Well, he'd start making phone calls. And he would get up
18 out of the office. Because they have a lot of administrative
19 stuff to do. So he would come out of his office and start
20 making calls and trying to get -- you know, calling the
21 captains and the shift captains or talking to the warden or
22 whoever trying to get patients -- trying to get us patients to
23 medical.

24 Q. In your opinion, was Williamson -- when he was there
25 working for Centurion, was he cooperative and helpful in trying

1 to get the patients to medical?

2 A. Absolutely, yes, sir.

3 Q. And who -- did he get replaced as the administrator?

4 A. He did.

5 Q. And who replaced him?

6 A. Travis Day.

7 Q. Can you give us an approximate date about when Mr. Day
8 took over as the administrator?

9 A. I think it was around Memorial Day in May, somewhere --

10 Q. Would this be 2019?

11 A. 2019. Yes, sir.

12 Q. And just, if you would, describe in your own words and
13 tell the jury what did you observe about Travis Day, especially
14 so far as doing his job in getting inmates out to medical, to
15 see medical.

16 A. I mean, I could never -- I mean, he was hard to find.
17 Sometimes he wasn't at work. Sometimes he wasn't in his
18 office. If I told him, you know, I've got 20 patients on my
19 schedule; and I've seen one, he would say, well, I've notified
20 Dr. Ramsue; and I've notified April Meggs; and everybody knows
21 it; and we're doing the best we can.

22 You know, sometimes I'll go back there; and there would be
23 women all in his office. At one point, I walked back there;
24 and there was a woman -- an officer that give him a massage.
25 And ever -- you know, I just walked way.

1 Q. Did you say a lot of times he wasn't there, and he wasn't
2 present?

3 A. Yes, sir. I couldn't find him, or he wasn't at work; or
4 he'd come in late or leave early or not come at all, you know.

5 Q. Did you know -- do you know whether or not Dr. Woods, Amy
6 Woods, continued to -- or complained to Day about not getting
7 the prisoners over to medical?

8 A. Yes, sir. We all complained. Everybody complained. To
9 him.

10 Q. To him? To Day?

11 A. Yes, sir.

12 Q. In your opinion, who was the proper person to complain
13 too?

14 A. Well, I mean, for me --

15 MR. LONG-DANIELS: Objection, Your Honor.

16 THE COURT: Objection sustained.

17 BY MR. WAIDE:

18 Q. From your observation, from your work there, who -- based
19 on your own personal observations, who did you think you should
20 complain to?

21 A. Well, I had to go to the administrator, to our
22 administrator, Mr. Day or Mr. Williamson.

23 Q. Mr. Day?

24 A. Right. And Dr. Woods. I told her and -- that's what they
25 told me to do when I started. If you have a problem getting

1 patients, you go to the administrator and the medical director.

2 And that's what I did.

3 Q. How severe a problem was it in getting patients? How --

4 just describe that. Do you mean getting patients over to the

5 medical area, or do you mean getting patients to outside

6 appointments?

7 A. Well, to the medical area. You know, some days it was a

8 lot worse than others like anywhere. But, I mean, what I had

9 to do is I had an appointment list of 20 to 25 people that I

10 had to see just like she did. And my first place that I had to

11 go to was the nurses.

12 And I would say, "Have y'all called for these patients?"

13 And they would say, Well, we called A Dorm and nobody answered;

14 or we called B Dorm, and they're busy. We called C, and

15 they're going to get theirs up here as soon as they can.

16 So, in 15 or 20 minutes, if I still didn't have a patient,

17 I went to my officer. We had a medical officer. And I would

18 ask her -- you know, here's my list. The nurses have done

19 this. Am I going to get any patients? And, from that, they'd

20 say, Well, I called A Dorm; and they didn't have but one

21 officer, you know. Or I called B Dorm and didn't get an

22 answer.

23 I mean, so, after that, if I still didn't get patients, I

24 went to the administrator and Dr. Woods and said, you know,

25 hey, I've been here for five hours or two hours; and I've got

1 25 people to see; and I've seen two or one or none or whatever.

2 Q. Do you remember how you learned that Dr. Woods had lost
3 her job? How did it come about you learned that?

4 A. She called me.

5 Q. Just tell me about that. She called you. And, first of
6 all, what kind of state was she in when she called you?

7 MR. LONG-DANIELS: Objection, Your Honor. Hearsay.

8 THE COURT: Sustained.

9 BY MR. WAIDE:

10 Q. If you would, from your observation, how did her voice
11 sound when you talked to her? Don't tell me what she said.
12 But how did her voice sound?

13 A. She sounded teary. And Dr. Woods doesn't cry. She is not
14 somebody to get that upset.

15 Q. Did she give you any explanation about why she was no
16 longer there?

17 MR. LONG-DANIELS: Objection, Your Honor.

18 MR. WAIDE: Your Honor, it's not for the truthfulness
19 of it. It's just to show the scenario leading up to the facts.
20 How she lost her job is not the question.

21 MR. LONG-DANIELS: I think --

22 THE COURT: Sustained.

23 BY MR. WAIDE:

24 Q. Don't tell me what was said. But, when she first called
25 you, did she know any -- did you learn any specifics about why

1 she was no longer -- any specifics about it?

2 A. Yes, sir.

3 Q. Okay. When she first called you, do you know whether she
4 had actually been terminated or had she only lost her security
5 clearance?

6 A. She had only lost her security clearance when she first
7 called me.

8 Q. Okay. After she left, was there a doctor there to take
9 her place?

10 A. No, sir.

11 Q. How long did y'all go without a doctor?

12 A. We had a doctor that came every couple of weeks on
13 Thursday and helped out. But we ended up getting a doctor --
14 shortly before I left in February of '20, they hired a doctor.
15 But he wasn't there but a couple of weeks, and he had to be let
16 go for some reason. I don't really know why.

17 Q. And when did you leave?

18 A. I left in February of 2020.

19 Q. And she left in June of '19, I believe; is that correct?

20 A. Yes, sir.

21 Q. All right. So, from June of '19 until you left in
22 February -- did you say February of 2020?

23 A. 2020.

24 Q. During that entire time, how much of that time did y'all
25 have a doctor actually working there on site?

1 A. Twice a month.

2 Q. A doctor would come twice a month?

3 A. Yes, sir. You know, give or take. I mean, he was
4 supposed to come twice a month; that's what they were trying to
5 get him to come, is twice a month.

6 Q. Okay. Where did he live?

7 A. He lived in Jackson, if I'm not mistaken.

8 Q. All right. Now, you say you were a nurse practitioner.

9 Did he then become your proctor?

10 A. No, sir. Dr. Ramsue was my collaborating doctor when Dr.
11 Woods left.

12 Q. Where did Dr. Ramsue live?

13 A. Dr. Ramsue lived in Atlanta, Georgia, I think. But I'm
14 not -- I think he lived in Georgia, but his practice was in
15 Jackson.

16 Q. Did he have -- do you know whether he had an office in
17 Jackson?

18 A. That would have just been with Centurion.

19 Q. How far is it from the Marshall County prison to Jackson,
20 Mississippi?

21 A. Maybe 150 miles, 200. I'm not sure.

22 Q. Now, you say you're a licensed practitioner?

23 A. Yes, sir.

24 Q. And do you know the rules about how close your property is
25 suppose to be to you if you're working as a nurse practitioner?

1 A. At the time, it was, I think, 75 miles.

2 Q. Seventy-five miles?

3 A. Uh-huh.

4 Q. And was he farther or closer than 75 miles?

5 A. I suppose his office would have been farther.

6 Q. Okay. From Jackson to Marshall County.

7 A. Right.

8 Q. How often did Dr. Ramsue come up and actually see patients

9 before you left, actually see patients at the clinic -- I'm

10 sorry -- at the prison?

11 A. He didn't see patients at all.

12 Q. How often did he come up and review your charts?

13 MR. LONG-DANIELS: Your Honor, object to relevancy.

14 Dr. Woods --

15 MR. WAIDE: It's relevant what kind of medical care

16 they were providing there, Your Honor.

17 MR. LONG-DANIELS: Your Honor, this is (inaudible)

18 Dr. Woods.

19 THE COURT: All right. The objection's overruled.

20 But let's move on through this pretty quickly.

21 MR. WAIDE: All right.

22 BY MR. WAIDE:

23 Q. How often would he come and have you to -- or review your

24 charts?

25 A. I think he came --

1 THE COURT: Now, we're not interested in what you
2 think. Either you know or you don't know.

3 BY MR. WAIDE:

4 Q. If you don't know, that's fine. You're not -- you don't
5 remember?

6 A. I know it was twice.

7 Q. Twice?

8 A. Yes, sir.

9 MR. WAIDE: May I have just a moment?

10 THE COURT: All right.

11 (Pause)

12 THE COURT: Okay. Let's move on. You've got a
13 witness.

14 BY MR. WAIDE:

15 Q. Do you remember -- do you remember April Meggs coming to
16 the prison participating in giving Dr. Woods an award because
17 of her assistance in getting -- in helping a guard who was
18 being assaulted? Do you remember that?

19 A. Yes, sir.

20 Q. Who was the guard that was assaulted?

21 A. It was Mrs. Mildred Burgess.

22 Q. And did that happen in the medical area?

23 A. Yes, sir.

24 Q. Was that assault of the guard related to the shortage of
25 staff?

1 A. Yes. When she went back there, she went by herself; and
2 there was no other officers. And he was a close-custody
3 inmate, which meant he was a little more dangerous. And she
4 walked by herself, and there's supposed to be two of them; and
5 he attacked her.

6 Q. And you say you remember Dr. Woods getting some sort of
7 award because of whatever she did regarding that assault?

8 A. It was, like, a leadership or recognition award of some
9 kind.

10 Q. Do you remember while Miss -- Ms. Meggs is the lady that
11 was sitting over here at counsel table representing Centurion,
12 right?

13 A. Yes, sir.

14 Q. Do you recall whether or not at that time Dr. Woods
15 brought to Ms. Meggs' attention the problem they had in the
16 shortage of security in getting prisoners over to medical?

17 A. I don't remember that, but we were shook. So I don't
18 remember that specifically being said. I don't mean it wasn't;
19 I just don't remember it.

20 MR. WAIDE: All right.

21 Thank you, Your Honor.

22 THE COURT: Okay.

23 Centurion may cross-examine.

24 MR. LONG-DANIELS: Thank you, Your Honor. We're
25 going to be brief.

1 CROSS-EXAMINATION

2 BY MR. LONG-DANIELS:

3 Q. Ms. Cox, you work for Centurion?

4 A. Yes, sir.

5 Q. And I want to make sure, for the jury, we get the
6 reporting structure correct. Your supervisor was Dr. Woods,
7 correct?

8 A. Yes. Yes.

9 Q. She was the person that you were responsible to, correct?

10 A. For medical, yes, sir.

11 Q. She was in your chain of command, correct?

12 A. Yes, sir.

13 Q. Now, did you do a good job when you were working there at
14 Centurion?

15 A. I mean, I felt I did; but that's me, though.

16 Q. Yes, ma'am. I understand. Did Dr. Woods do a good job
17 taking care of inmates when she was there?

18 A. Dr. Woods did a wonderful job.

19 Q. No one at Centurion ever overturned any decision you made
20 about how to treat patients, did they?

21 A. Not that I know of, no.

22 Q. And, to your knowledge, nobody, including Dr. Woods, ever
23 told you to do anything illegal with respect to a patient's
24 care, did they?

25 A. No. Not anything illegal, no.

1 Q. And you wouldn't have done it if they had, would you?

2 A. No.

3 Q. And, to your knowledge, nobody told Dr. Woods to do
4 anything illegal while she was working as the medical director
5 at that facility in Marshall County?

6 A. As far as I know, no, sir.

7 Q. That just didn't happen, did it?

8 A. That they -- no.

9 Q. You spoke a minute about Dr. Ramsue. You know Dr. Ramsue,
10 correct?

11 A. Yes, sir.

12 Q. You told this fine jury that he was your collaborator
13 after Dr. Woods left?

14 A. Yes.

15 Q. And my fine counsel asked a question about whether he
16 reviewed your medical records, correct?

17 A. Yes, sir.

18 Q. And you said, no, he never came. Correct?

19 A. He came twice that I know of and reviewed records.

20 Q. But the records of Centurion were electronic records; were
21 they not?

22 A. Right.

23 Q. He could have reviewed those records from anywhere,
24 couldn't he?

25 A. Well, I mean, I sent him charts to review; but there was

1 quarterly reviews we did too, like quarterly meetings we did
2 with the doctor.

3 Q. Yes, ma'am.

4 A. But, yes, sir, I sent charts to him to review.

5 Q. Yes, ma'am. But all of the records for Centurion were
6 electronic records, correct?

7 A. Yes, sir.

8 Q. He didn't have to be at Marshall County reviewing the
9 records, did he?

10 A. Oh, no.

11 Q. He could have reviewed them from anywhere, couldn't he?

12 A. Yes.

13 Q. And you can't say under your oath today whether he
14 reviewed any of those records, can you?

15 A. I sent records to him, so --

16 Q. Yes.

17 A. -- I don't know if he reviewed them or not.

18 Q. That's my point.

19 A. Right.

20 Q. You can't say to this jury on your oath that Dr. Ramsue
21 did not review records, can you?

22 A. Right.

23 Q. That's just not something within the purview of your
24 knowledge?

25 A. Right. I don't know if he looked at them or not, what I

1 sent. I don't know.

2 Q. Now, you mentioned something when my friend Mr. Waide was
3 cross-examining you about whether Travis Day told April Meggs
4 or Dr. Ramsue something. Now, I want you to be clear with this
5 jury. You were not present when Travis Day told Dr. Ramsue
6 anything related to any complaints, were you?

7 A. No. He just told me he'd relayed it to him.

8 Q. So, just to be factual, you're repeating what he said.
9 You wasn't there.

10 A. No, no.

11 Q. You didn't hear.

12 A. No.

13 Q. You didn't observe it.

14 A. No.

15 Q. And you can't say on your oath today that he ever told
16 April Meggs anything, can you?

17 A. No.

18 Q. And you can't say on your oath today that he ever told Dr.
19 Ramsue anything, can you?

20 A. No.

21 Q. Finally, let me just ask you, you're friends with
22 Dr. Woods, aren't you?

23 A. I mean, I consider her a friend. But we don't get
24 together and go places and do things and that kind of stuff if
25 that's what you mean, no.

1 Q. But y'all are friends?

2 A. Yeah. I consider her a friend of mine.

3 Q. Did y'all talk about this case today when y'all were
4 together?

5 A. A little bit.

6 MR. LONG-DANIELS: That's all I have, Your Honor.

7 THE COURT: All right.

8 The Defendant Management may cross-examine.

9 MR. PEEPLES: Thank you, Your Honor.

10 CROSS-EXAMINATION

11 BY MR. PEEPLES:

12 Q. Hi, Ms. Cox. I'm Tim Peeples.

13 A. Hello.

14 Q. Nice to meet you. Centurion trained you in the chain of
15 command, correct?

16 A. Yes, sir.

17 Q. And you understood that you were expected to follow that,
18 right?

19 A. Right.

20 Q. And it sounds like from your testimony that you did in
21 fact follow the chain of command.

22 A. I feel like I did.

23 Q. You would either go -- I think you told us you would go to
24 the nurses to ask about patients. If that didn't work, you'd
25 go to Dr. Woods, the has, maybe even the security staff, right?

1 A. Right.

2 Q. And all of that was acceptable. That's within your chain
3 of command to do, right?

4 A. Uh-huh.

5 Q. Would you say yes for the record?

6 A. Yes, sir.

7 Q. Yes, ma'am. And I don't mean to correct you, it's just --

8 A. I know. I understand.

9 Q. Sure. No problem. And you understood that teamwork and
10 collaboration and working together, that's important in a
11 prison. Would you agree with that?

12 A. Yes, sir.

13 Q. Because there are some very dangerous people, right?

14 A. Yes.

15 Q. And you're -- you're a nurse practitioner. You're
16 essentially a doctor without the doctor's certificate. I know
17 that's a half joke. But that's fairly accurate. Would you
18 agree with that? You -- you're a medical person.

19 A. I can write -- yes. I can do a lot of things a doctor can
20 do, but I'm not a doctor.

21 Q. You're a very qualified medical person. Would you agree
22 with that?

23 A. Yes, sir.

24 Q. Okay. And you're not a -- you're not a corrections
25 officer or a sergeant or anybody who actually does security,

1 correct?

2 A. I'm not.

3 Q. Don't hold yourself out as somebody who has expertise in
4 that field, do you?

5 A. No.

6 Q. Okay. Don't want to do that job. It's a tough job.

7 Would you agree?

8 A. I don't want to do it.

9 Q. Yeah. Just like -- just like being a nurse practitioner
10 in a jail is; I'm sure. Same -- it's tough, right?

11 A. It's tough.

12 Q. Because people do bad things to get to jail. And, then,
13 when they get in jail, they do bad things there too, right?

14 A. Sometimes.

15 Q. And you mentioned the incident with Mrs. Burgess, right?
16 That was a concern for you, correct?

17 A. Yes.

18 Q. You're not aware of, being a medical person, whether she
19 violated any of her protocols that she was supposed to follow
20 as a corrections officer, are you?

21 A. No. That was not my specialty.

22 Q. Right. You just know it was a bad incident that -- I
23 think you said it shook you, right?

24 A. Yes.

25 MR. PEEPLES: All right. That's all I have, Your

1 Honor. Thank you.

2 THE COURT: All right.

3 Any rebuttal?

4 MR. WAIDE: Yes, sir, I do.

5 REDIRECT EXAMINATION

6 BY MR. WAIDE:

7 Q. All right. First, regarding protocols, do you know
8 whether or not there was a protocol there that they were
9 supposed to have at least one other security officer with her
10 when she treated that Level 4 patient and got assaulted?

11 A. Right.

12 Q. Did MTC violate that protocol by not having a security
13 guard --

14 A. There was not another officer with Mrs. Burgess when she
15 went to check on that inmate.

16 Q. And counsel -- I think both counsels asked you. I believe
17 counsel for Centurion first asked you about your being a good
18 doctor and good -- I mean, a good nurse practitioner and being
19 good at what you did?

20 A. Yes, sir.

21 Q. Would you tell the jury whether or not when you first
22 began work you notified Centurion that you had a problem doing
23 sutures?

24 A. Yes, sir, I did. I told them when they hired me that I
25 could not do that.

1 Q. How common is it for the prisoners to need sutures?

2 A. It's common. It happens a lot.

3 Q. When Amy came, how good was she at doing sutures?

4 A. Ex -- I mean, she could probably do it blindfolded. She
5 was very good.

6 Q. When you worked there without a doctor on premises and
7 when -- and after Dr. Woods had been fired, was there an issue
8 in getting sutures properly done?

9 A. Yes. I had to send them to the ER.

10 MR. WAIDE: That's all, Your Honor.

11 THE COURT: All right. You may step down.

12 (END OF THE TRIAL TESTIMONY OF TRACI COX)

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1 CERTIFICATE OF OFFICIAL REPORTER

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I, Rita Davis, Federal Official Realtime Court
Reporter, in and for the United States District Court for the
Northern District of Mississippi, do hereby certify that
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Dated this 22nd day of May, 2022.

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/s/ Rita Davis
RITA DAVIS, FCRR, RPR, CSR #1626
Federal Official Court Reporter

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